

## REMARKS

In an Office Action mailed on March 16, 2006, claims 1-31 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Harmon in view of Wesson; and objections were made to the specification and claim 19. The specification and claim 19 have been amended to overcome the corresponding objections. The § 103 rejections are addressed below.

### § 103 Rejections of Claims 1-13:

Independent claim 1 has been amended to more positively define the casing conveyed tool. More specifically, as amended, the method of independent claim 1 recites deploying a casing conveyed tool in a subterranean well and disposing the tool in a casing in the well such that the casing conveyed tool does not substantially obstruct a central passageway of the casing prior to actuation of the tool. Thus, a particular advantage of this technique is that, for example, a casing conveyed tool such as a perforating gun may be installed with a casing string, and cementing operations may be performed through the central passageway of the casing string prior to the firing of the perforating gun. Such operation would not be possible, for example, with a tool that obstructs the central passageway of the casing string prior to the tool's actuation. Of course, other and different advantages are possible in other embodiments of the invention.

Contrary to the limitations of amended independent claim 1, Wesson, relied on by the Examiner to allegedly teach a casing conveyed tool, discloses a gun system that is fully disposed inside an interior bore 37 of a tubular assembly prior to the firing of the gun system. Thus, advantages that flow from the claimed invention cannot be achieved using Wesson's gun system. In particular, due to the obstruction of the internal bore 37, cementing operations (as an example) may not be performed prior to the firing of Wesson's gun system.

Thus, not only does Wesson fail to teach or suggest acts of deploying and disposing of independent claim 1, the gun system of Wesson cannot achieve the advantages that flow from the claimed invention. Harmon fails to teach or suggest the missing claim limitations. Therefore, for at least the reasons that are set forth above, withdrawal of the § 103 rejections of claims 1-13 is requested.

§ 103 Rejections of Claims 14-26:

As amended, the system of independent claim 14 includes a casing conveyed tool that is adapted to be installed with a casing and is adapted to not substantially obstruct a central passageway of the casing prior to actuation of the tool.

Contrary to the limitations of amended independent claim 14, Wesson's gun system obstructs the internal bore 37 prior to its firing. Thus, Wesson fails to teach or suggest the casing conveyed tool of amended independent claim 14. Harmon fails to teach or suggest the missing claim limitations. Therefore, for at least the reasons that are set forth above, withdrawal of the § 103 rejections of claims 14-26 is requested.

§ 103 Rejections of Claims 27-31:

As amended, the tool of independent claim 27 includes a first mechanism that is adapted to not substantially obstruct a central passageway of a casing string section prior to the first mechanism performing a downhole function.

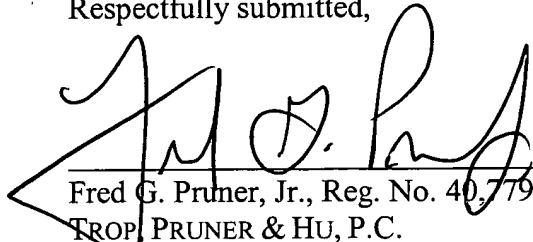
Contrary to the limitations of amended independent claim 27, Wesson's gun system, which is alleged to disclose the first mechanism of independent claim 27, obstructs the internal bore 37 prior to the gun system performing a downhole function. As such, Wesson fails to teach or suggest the first mechanism of amended independent claim 27. Harmon fails to teach or suggest the missing claim limitations. Therefore, for at least the reasons that are set forth above, withdrawal of the § 103 rejections of claims 27-31 is requested.

CONCLUSION

In view of the foregoing, withdrawal of the § 103 rejections and a favorable action in the form of a Notice of Allowance are requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504 (SHJ.0004US).

Respectfully submitted,

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